

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION

KIRBY INLAND MARINE, LP \* Civil Action No.  
\* 3:19cv207

*Plaintiff,*

V.

FPG SHIPHOLDING PANAMA 47 S.A., K  
LINE ENERGY SHIP MANAGEMENT, and  
the VLGC GENESIS RIVER, *in rem*

*Defendants.*

\* \*

IN THE MATTER OF Rule 9(h) Admiralty

KIRBY INLAND MARINE, LP,

in a cause of exoneration from

or limitation of liability

\* \*

Consolidated with

IN THE MATTER OF THE COMPLAINT OF \* C.A. NO. 3:19-cv-372  
FPG SHIPHOLDING PANAMA 47 S.A., \* Admiralty -- Rule 9(h)  
SHIP NO. 138 CO. LTD., SHIP NO. 139 CO. \*  
LTD., GENESIS RIVER SHIPPING, S.A. AND \*  
“K” LINE ENERGY SHIP MANAGEMENT \*  
CO., LTD., AS OWNER AND OWNER PRO \*  
HAC VICE OF THE VLGC GENESIS RIVER \*  
PETITIONING FOR EXONERATION FROM \*  
OR LIMITATION OF LIABILITY \*

\* \*

**CLAIMANTS’ CONTESTED MOTION IN LIMINE TO EXCLUDE THE  
EXPERT TESTIMONY OF DR. BENJAMIN CORD HARRIS**

NOW INTO COURT, come liaison counsel for the OPA Claimants, who file  
this Contested Motion in Limine to Exclude the Expert Testimony of Dr. Benjamin

Cord Harris, and, pursuant to Federal Rule of Evidence Rule 702, respectfully move this Honorable Court to exclude any testimony of Genesis River's expert witness, Dr. Benjamin Cord Harris.

Respectfully submitted,

PIVACH, PIVACH, HUFFT,  
THRIFFILEY & DUNBAR, L.L.C.  
ATTORNEYS AT LAW

By: /s/ Corey E. Dunbar  
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LIAISON COUNSEL on behalf of all  
claimants

and

By: /s/ William Dills (by permission)  
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LIAISON COUNSEL on behalf of all  
claimants

**CERTIFICATE OF SERVICE**

I hereby certify that counsel of record, who are deemed to have consented to electronic service in the above-referenced case, are being served this 9th day of December, 2021 with a copy of the above document via the court's CM/ECF System per Local Rule 5.1.

Corey E. Dunbar

COREY E. DUNBAR